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9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14 v.
15 MARIO GONZALEZ,
16 Defendant.

CASE NO. 2:20-CR-13-WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: June 29, 2020
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
19 through defendant's counsel of record, hereby stipulate as follows:

- 20 1. By previous order, this matter was set for status on June 29, 2020.
- 21 2. By this stipulation, defendant now moves to continue the status conference until August
22 3, 2020, and to exclude time between June 29, 2020, and August 3, 2020, under Local Code T4.
- 23 3. The parties agree and stipulate, and request that the Court find the following:
- 24 a) The government has represented that the discovery associated with this case
25 includes video/audio recordings and written reports. The government has provided extensive
26 initial discovery in the form of these recordings and reports. However, the defendant has
27 requested additional discovery, which the government is now producing.
- 28 b) Counsel for defendant desires additional time to review discovery, consult with

1 his client, research his criminal history, pursue further investigation, discuss possible resolution
2 with the assigned AUSA and otherwise prepare for trial.

3 c) Counsel for defendant believes that failure to grant the above-requested
4 continuance would deny him/her the reasonable time necessary for effective preparation, taking
5 into account the exercise of due diligence.

6 d) The government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of June 29, 2020 to August 3, 2020,
12 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
13 because it results from a continuance granted by the Court at defendant's request on the basis of
14 the Court's finding that the ends of justice served by taking such action outweigh the best interest
15 of the public and the defendant in a speedy trial.

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1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

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7 Dated: June 24, 2020

McGREGOR W. SCOTT
United States Attorney

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9 /s/ MICHAEL W. REDDING
MICHAEL W. REDDING
Assistant United States Attorney


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11 Dated: June 24, 2020

/s/ Douglas Beevers
Douglas Beevers
Counsel for Defendant
MARIO GONZALEZ

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16 **FINDINGS AND ORDER**

17 IT IS SO FOUND AND ORDERED.

18 Dated: June 25, 2020

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20 WILLIAM B. SHUBB
21 UNITED STATES DISTRICT JUDGE
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